

STATE OF INDIANA) ST. JOSEPH SUPERIOR/CIRCUIT COURT
) SS
ST. JOSEPH COUNTY)
) 71D04-1803-CT-000125

SHARON FORTE and MARK FORTE)
)
Plaintiffs)
)
v.)
)
WAL-MART STORES, INC.)
)
Defendant)

COMPLAINT FOR DAMAGES

COUNT I

Plaintiff, Sharon Forte, by counsel, and for Count I of this Complaint for Damages, states as follows:

1. On or about March 26, 2016, Sharon Forte was a business invitee on the premises of the Wal-Mart Store located in Mishawaka, St. Joseph County, Indiana.
2. Wal-Mart Stores, Inc., was negligent because it breached its duty to plaintiff by failing to use reasonable care in keeping its premises safe and free of dangerous conditions, by failing to warn of dangerous conditions, and by causing unsafe conditions.
3. As a direct and proximate result of the defendant's negligence, Sharon Forte has sustained personal injuries and has suffered damages as a result.

WHEREFORE, Plaintiff, Sharon Forte, by counsel, hereby requests judgment against the Defendant in an amount adequate to compensate her for her damages, for cost of this action, and for all other just and proper relief.

COUNT II

Plaintiff, Mark Forte, by counsel, and for Count II of this Complaint for Damages, states as follows:

1. Plaintiff realleges paragraphs 1 through 5 of Count I and incorporates them herein as part of Count II.

2. At all relevant times herein, Mark Forte was and is the husband of Plaintiff, Sharon Forte.

3. As a further direct and proximate result of the carelessness and negligence of the Defendant, Mark Forte has lost the love, companionship and services of his wife, Sharon Forte.

WHEREFORE, Plaintiff, Mark Forte, by counsel, requests judgment against the Defendant in an amount adequate to compensate him for his losses, for cost of this action, and for all other just and proper relief.

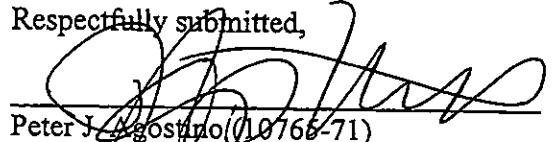
Respectfully submitted,

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JURY DEMAND

Plaintiffs, by counsel, request trial by jury.

Respectfully submitted,


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